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September 24, 2003

VIA FEDERAL EXPRESS

Commission's Secretary
 Office of the Secretary
 Federal Communications Commission
 9300 East Hampton Drive
 Capital Heights, MD 20743

Re: RM No. 10603

Dear Secretary,

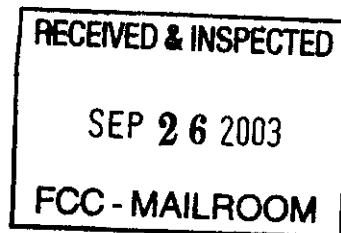
Enclosed is an original and four copies of the Comments of Arlington Telephone Company, The Blair Telephone Company, Eastern Nebraska Telephone Company, Rock County Telephone Company, Hershey Cooperative Telephone Company, City of Faith Municipal Telephone Company, Kennebec Telephone Company, Roberts County Telephone Cooperative Association, RC Communications and Northwest Telephone Cooperative Association for filing in the above-referenced docket. Also enclosed is an additional copy that we would ask that you please file-stamp and return to the undersigned in the enclosed self-addressed, stamped envelope.

Very truly yours,

Kelly R. Dahl
 Kelly R. Dahl
 FOR THE FIRM

KRD/eam
 DOCS/572026 1
 Enclosures

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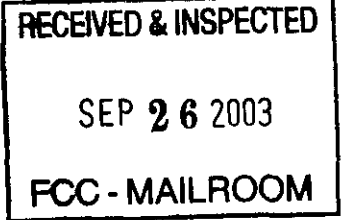
Commission's Secretary
September 24, 2003
Page 2

cc: (w/enc. - Via U.S. Postal Service Express Mail)

Qualex International (one copy)
Portals II
445 12th Street S W.
CY-B402
Washington, D.C. 20554

Pricing Policy Division (two copies)
Attn: Jeremy D. Marcus
Wireline Competition Bureau
445 12th Street, S.W.
Washington, D.C. 20554

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554



In the Matter of)
)
National Exchange Carrier Association, Inc.) RM No. 10603
)
Petition to Amend Section 69.104 of the)
Commission's Rules)

**Comments of Arlington Telephone Company, The Blair Telephone Company,
Eastern Nebraska Telephone Company, Rock County Telephone Company,
Hershey Cooperative Telephone Company, City of Faith Municipal
Telephone Company, Kennebec Telephone Company, Roberts County
Telephone Cooperative Association, RC Communications
and Northwest Telephone Cooperative Association**

Arlington Telephone Company ("Arlington"), The Blair Telephone Company ("Blair"), Eastern Nebraska Telephone Company ("Eastern"), Rock County Telephone Company ("Rock County"), Hershey Cooperative Telephone Company ("Hershey"), City of Faith Municipal Telephone Company ("Faith"), Kennebec Telephone Company ("Kennebec"), Roberts County Telephone Cooperative Association and RC Communications (together, "Roberts County") and Northwest Telephone Cooperative Association ("Northwest")¹ (collectively, the "Companies"), by and through their attorneys, respectfully submit these comments in response to the Commission's August 26, 2003, Public Notice requesting comment on the Joint Petition for Expedited Waiver filed on August 19, 2003, by various telephone industry groups (the "Associations") in the above-captioned matter. Specifically, the Associations seek an interim waiver of Section 69.104 of the Commission's rules to reduce the number of End User Common Line ("EUCL") charges (commonly referred to as Subscriber Line Charges or "SCLs") carriers

¹ Arlington, Blair, Eastern and Rock County are incumbent local exchange carriers serving rural areas of Nebraska. Hershey is a telephone cooperative providing service in rural Nebraska. Faith is a municipal telephone company in South Dakota. Kennebec is a local exchange carrier providing service in rural South Dakota. Roberts County is a rural telephone cooperative which provides service in South Dakota and North Dakota. Northwest is a rural telephone cooperative providing service in Iowa. All of the Companies are "rural telephone companies" as defined in the Communications Act of 1934, as amended (the "Act").

must assess on customers ordering exchange access service provisioned using digital, high capacity T-1 interfaces for which the customer supplies the terminating channelization equipment (“channelized T-1 services”).

The Companies agree that the current rules under which carriers must assess SLC charges for channelized T-1 services are unfairly burdensome to rural business customers and, therefore, support the interim waiver sought by the Associations. The Companies believe that their rural business subscribers are disadvantaged by the high SLC rates that must be applied to customer-ordered digital, high capacity T-1 interfaces. Functionally-similar PRI ISDN services are presently not available in the rural areas served by the Companies, as it would not be feasible nor economical for the Companies to furnish such technology.

Rural business customers ordering channelized T-1 services (in part, because it is the preferred technology and, in part, because it may be the only option available) incur significant excessive costs in obtaining such services. The Companies would like to be able to offer their rural business customers digital, high capacity T-1 services at prices more closely associated to actual loop costs and at prices comparable to functionally-equivalent PRI ISDN services. With respect to actual loop costs associated with provisioning T-1 services, the Companies defer to NECA’s cost analysis “which showed that the relative cost of the T-1 loop as compared to a voice grade analog loop, or POTS loop, is 3.76 to 1 for pool members.”² The Companies believe that the 5 to 1 relationship for assessing SLCs proposed by the Associations is a reasonable one given that 24 individual circuits served on copper would take 24 loops while a T-1 providing 24 circuits would, conceptually, take no more than four loops.

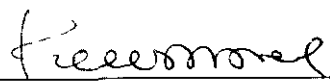
² *National Exchange Carrier Association, Inc., Petition to Amend Section 69.104 of the Commission’s Rules*, RM 10603, Joint Petition for Expedited Waiver (filed Aug. 19, 2003) at 6

The Companies urge the Commission to grant the waiver requested by the Associations. Functionally-equivalent services should be afforded equal regulatory treatment, and customers of small rural independent telephone companies should not be unfairly disadvantaged by excessive mandatory charges.

Dated this 24th day of September, 2003.

Respectfully submitted,

Arlington Telephone Company
The Blair Telephone Company
Eastern Nebraska Telephone Company
Rock County Telephone Company
Hershey Cooperative Telephone Company
City of Faith Municipal Telephone Company
Kennebec Telephone Company
Roberts County Telephone Cooperative Association
RC Communications
Northwest Telephone Cooperative Association
(the "Companies")

By: 
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